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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

JOSE GUARDADO, et al.,

Plaintiffs,

v.

CITY AND COUNTY OF SAN FRANCISCO,
et al.,

Defendants.

Lead Case No. 22-cv-01587-JSW

Case No. 4:22-cv-04319-JSW

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO EXCHANGE INITIAL
DISCOVERY PURSUANT TO GENERAL
ORDER NO. 71**

Date Action Filed: July 26, 2022

Trial Date: Not Set

Pursuant to Northern District of California Civil Local Rules 7-12, and 16-3(e), PLAINTIFFS
JOSE GUARDADO et al. ("Plaintiffs") and DEFENDANT CITY AND COUNTY OF SAN
FRANCISCO ("Defendant") through their counsel of record, HEREBY AGREE AND STIPULATE AS

1 FOLLOWS:

2 1. WHEREAS, on July 26, 2022, Plaintiffs Jose Guardado, Melissa Borzoni, Andrew
3 Maloney, Rommel Taylor, Penni Eigster, Tara Amado and Danielle Bologna, on behalf of themselves
4 and others similarly situated, filed a civil complaint with this Court against Defendant City and County
5 of San Francisco (Defendant). (Dkt. No. 1);

6 2. WHEREAS, on February 2, 2023, the case was reassigned to the Honorable Jeffrey S.
7 White. See Dkt. No. 26;

8 3. WHEREAS, on March 14 and March 15, 2023, attorneys at Seyfarth Shaw, LLP filed
9 notices of appearance with the Court to serve as lead counsel for Defendant. See Dkt. Nos. 40-43;

10 4. WHEREAS, on May 1, 2023, the Court entered an Amended Minute Entry setting
11 various case deadlines following the April 28, 2023 Case Management Conference. See Dkt. No. 55.
12 Pursuant to the Court's Amended Minute Entry, for all parties in the related actions, initial discovery
13 obligations under General Order 71 are due 90 days from the date of the initial Case Management
14 Conference, or July 27, 2023;

15 5. WHEREAS, counsel for Defendant has diligently reviewed the pleadings, claims, and
16 information in this action but has required additional time to prepare responses pursuant to General
17 Order 71 discovery;

18 6. WHEREAS, on July 5, 2023, counsel for Defendant informed Plaintiffs that counsel will
19 be seeking to withdraw from this Action, and Defendant will seek substitute counsel;

20 7. WHEREAS, the Parties have agreed and respectfully submit that an extension of time for
21 Defendant to provide initial discovery pursuant to General Order 71 is necessary for the transition of
22 Defendant's defense.

23 THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:

24 1. The Parties have agreed and respectfully submit that the anticipated withdrawal of
25 counsel for Defendant and its anticipated substitution of new counsel and need for additional time to
26 respond necessitate an extension for the Parties' to exchange initial discovery pursuant to General Order
27 71.
28

2. The Parties shall exchange initial discovery pursuant to General Order 71 by September 6, 2023.

IT IS SO STIPULATED.

DATED: July 25, 2023

PACIFIC JUSTICE INSTITUTE

By: /s/ Kevin T. Snider

Kevin T. Snider

Counsel of Record

Matthew B. McReynolds

Emily C. Mimnaugh

Ronn Bisbee

Attorneys for Plaintiffs,
GUARDADO, et al.

DATED: July 25, 2023

SEYFARTH SHAW LLP

By: /s/ Yoon-Woo Nam

Coby M. Turner

Eric M. Lloyd

Dawn R. Solowey (*pro hac vice*)

Yoon-Woo Nam

Attorneys for Defendant

CITY AND COUNTY OF SAN FRANCISCO

ATTESTATION OF E-FILED SIGNATURE

I, Yoon-Woo Nam, am the ECF User whose ID and password are being used to file this Stipulation and Proposed Order Extending Time to Exchange of Initial Discovery Pursuant to General Order 71. In compliance with Local Rule 5-1(i)(3), I attest that Kevin T. Snider has read and approved this pleading and consented to its filing in this action.

DATED: July 25, 2023

SEYFARTH SHAW LLP

By: /s/ Yoon-Woo Nam
Yoon-Woo Nam

**ORDER GRANTING EXTENSION OF TIME TO EXCHANGE OF INITIAL DISCOVERY
PURSUANT TO GENERAL ORDER 71**

The Court finds the anticipated withdrawal of counsel for Defendant and its anticipated substitution of new counsel and need for additional time to respond necessitate an extension for the Parties' to exchange initial discovery pursuant to General Order 71. The Parties shall exchange initial discovery pursuant to General Order 71 by September 6, 2023.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

Hon. Jeffrey S. White
UNITED STATES DISTRICT JUDGE